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10 **UNITED STATES BANKRUPTCY COURT**

11 **EASTERN DISTRICT OF CALIFORNIA**

12 **SACRAMENTO DIVISION**

13 In re

Case No. 21-23169–B–11

14 CALIFORNIA INDEPENDENT
15 PETROLEUM ASSOCIATION,

Chapter 11

DCN SK-17

16 Debtor and Debtor-in-Possession

Chapter 11-Subchapter V

17 **Hearing:**

18 Date: May 3, 2022

19 Time: 2:00 PM

20 Ctrm: 32 Dept. B

501 I Street, 6th Floor

Sacramento, CA 95814

21
22 **DECLARATION OF ROCK ZIERMAN IN SUPPORT OF FIRST INTERIM**
23 **APPLICATION BY GENERAL BANKRUPTCY COUNSEL FOR DEBTOR AND**
24 **DEBTOR IN POSSESSION FOR COMPENSATION AND REIMBURSEMENT OF**
25 **EXPENSES FOR THE PERIOD SEPTEMBER 6, 2021 THROUGH JANUARY 31, 2022**

26 I, Rock Zierman, declare as follows:

27 1. I am an individual over the age of 18 and the Chief Executive Officer of California
28 Independent Petroleum Association (“CIPA” or “Debtor”), the Debtor and Debtor in Possession in

1 the above captioned bankruptcy case. I have personal knowledge of the matters discussed below,
2 and if called as a witness I could and would competently testify thereto.

3 2. Due to the Debtor being a non-for-profit organization and the complex litigation
4 history which lead CIPA to file for bankruptcy, the Debtor required sophisticated legal counsel that
5 could properly handle and resolve the various issues unique to CIPA.

6 3. The Debtor selected Sklar Kirsh, LLP ("Sklar Kirsh") based on Sklar Kirsh
7 professionals' background, skill set, reputation for providing excellent legal services, and
8 experience representing Subchapter V debtors and other complex restructuring matters. Sklar Kirsh
9 has worked tirelessly to ensure the Debtor has been able to operate its business throughout the
10 bankruptcy process and has worked diligently to try to confirm a plan of reorganization.

11 4. I have reviewed Sklar Kirsh's First Interim Application for Compensation and
12 Reimbursement of Expenses for the period of September 6, 2021 through January 31, 2022
13 ("Application").

14 5. As a result of my review of the Application and my active participation in the
15 administration of this case, I am convinced that the services rendered by Sklar Kirsh on behalf of
16 the estate were necessary for the benefit of the Debtor's bankruptcy estate as well as efficiently
17 performed.

18 6. Furthermore, the services provided by Sklar Kirsh before the effective date of its
19 employment was critical in Debtor's ongoing efforts to reorganize. If Sklar Kirsh did not provide
20 these services prior to their employment, it could have had a dramatic negative impact on Debtor's
21 reorganization efforts and its operations. Accordingly, I do not oppose, and in fact support the
22 Application.

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 5 day of April, 2022 at Sacramento, California.

DATED:



By:

Rock Zierman
Chief Executive Officer of California Independent
Petroleum Association